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November 10, 2023

VIA ECF & EMAIL

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: *U.S. v. Kahlil Williams*
22 CR 452 (CS)**

Dear Judge Seibel:

I represent Khalil Williams in the above-referenced matter. On February 15, 2022, Mr. Williams was released on a \$150,000 personal recognizance bond signed by two financially responsible persons with strict pre-trial supervision, home detention and location monitoring. Mr. Williams has entered the Focus Forward Program and is scheduled to graduate in December. The purpose of this letter is to respectfully request a modification of Mr. Williams' bond conditions as a result of the violation that was filed with the Court on November 8, 2023.

Mr. Williams is currently employed at Auto Zone. When the delivery person is unavailable, Mr. Williams is occasionally required to make deliveries of auto parts to other autobody shops nearby. He has provided proof of each of these deliveries to Pretrial Services; however, Pretrial's interpretation of the prior Court Order is that Mr. Williams' employment is stationary and he cannot make deliveries for work, even in the immediate vicinity. Pretrial has requested that we obtain a Court Order if he is to travel for deliveries when he is required to. Proof of all deliveries will be provided to Pretrial Services. The Government has no objection to this request. Accordingly, it is respectfully requested that the Court modify Mr. Williams' bond conditions to permit him to travel during work hours for deliveries while the delivery person is unavailable.

Defendant may make deliveries only as required by his employer, and he must provide proof to Pretrial Services within 24 hours. He may not make any stop of any sort other than what is required by his employer and documented.

SO ORDERED.

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CATHY SEIBEL, U.S.D.J.

11/10/23

The Court's time and consideration of this matter are greatly appreciated.

Respectfully submitted,

/s/

Margaret M. Shalley

cc: All counsel (*via ECF and email*)